

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FIRESTAR DIAMOND, INC., *et al.*

Debtors.

Chapter 11

No. 18-10509 (SHL)

(Jointly Administered)

RICHARD LEVIN, Chapter 11 Trustee of FIRESTAR
DIAMOND, INC., FANTASY, INC., and OLD AJ,
INC. f/k/a A. JAFFE, INC.,

Plaintiff,

Adv. Proc. No. 20-1054

v.

AMI JAVERI (A/K/A AMI MODI); PURVI MEHTA
(A/K/A PURVI MODI); NEHAL MODI; NEESHAL
MODI; CENTRAL PARK REAL ESTATE, LLC;
CENTRAL PARK SOUTH 50 PROPERTIES, LLC;
TRIDENT TRUST COMPANY (SOUTH DAKOTA)
INC., solely as Trustee of the ITHACA TRUST;
TWIN FIELDS INVESTMENTS LTD.; AURAGEM
COMPANY LTD.; BRILLIANT DIAMONDS LTD.;
ETERNAL DIAMONDS CORPORATION LTD.;
FANCY CREATIONS COMPANY LTD.;
HAMILTON PRECIOUS TRADERS LTD.; SINO
TRADERS LTD.; SUNSHINE GEMS LTD.;
UNIQUE DIAMOND AND JEWELLERY FZC;
WORLD DIAMOND DISTRIBUTION FZE; VISTA
JEWELRY FZE; EMPIRE GEMS FZE; UNIVERSAL
FINE JEWELRY FZE; DIAGEMS FZC; TRI COLOR
GEMS FZE; PACIFIC DIAMONDS FZE;
HIMALAYAN TRADERS FZE; UNITY TRADING
FZE; FINE CLASSIC FZE; DG BROTHERS FZE,

Defendants.

DECLARATION OF PURVI MODI IN SUPPORT OF MOTION TO DISMISS

I, PURVI MODI, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as
follows:

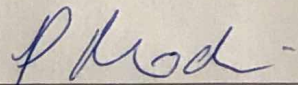
1. My name is Purvi Modi. I have also been referred to as Purvi Mehta.
2. I submit this Declaration in support of my Motion to Dismiss the Complaint filed in the above-captioned adversary proceeding (the "Action").
3. I am a Defendant in this Action, but I have not been served with the Summons or Complaint to date.
4. It is my understanding that the Summons and Complaint may have been left in a letterbox at my former address in Hong Kong.
5. However, at that time, I was not residing in Hong Kong and for that matter have not resided there since February 2018. More specifically, I was not physically present in Hong Kong on May 12, 2020, the date of purported service.
6. In February 2018, I went to Belgium to visit my parents. I have resided in Belgium since this time.
7. I am a Belgian national and passport holder and am officially registered there since October 2, 2019.
8. I have not visited or been physically located in Hong Kong at any time since February 2018.
9. I will suffer substantial burden if asked to defend myself in this Action in the United States and it would be vexatious for me to suffer proceedings therein.
10. I do not live in the United States, and have never lived there.
11. I have not visited the United States since May 2016.
12. I do not directly own any United States entities.
13. I do not control, manage or oversee any United States entities or businesses.

14. I do not work in the United States, or directly offer or advertise services or goods to the United States marketplace or its citizens.

15. I have not directed acts of any kind towards the United States with the understanding or expectation that those acts would avail me of the privilege of conducting activities in the United States, or invoke the benefits or protections of United States law.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 11, 2020.



PURVI MODI